Puerto Rico Department of Health
Public Water Supply Supervision Program
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Department of Health

# Document transmittal

То: Е	Bruce Kiselica		From:		na Rodríguez
Company:	EPA Region 2		Date:	April 2	5, 2006
Fax:			Pages:	10	(including cover)
Re:	MDBP-2 Partnership A	greement		······································	
□Urgent	☐ For Review	☐ Please Com	nment		☐ Please Reply
Comments:	Enclosed is the PRI Olga I. Rivera. Plea Thank you.	OOH MDBP-2 ase sign the do	Partno cumen	ership <i>i</i> t and fo	Agreement signed by Drward it to PRDOH.

### PARTNERSHIP AGREEMENT

PUERTO RICO DEPARTMENT OF HEALTH/
PUBLIC WATER SUPPLY SUPERVISION PROGRAM and
US ENVIRONMENTAL PROTECTION AGENCY – REGION 2

Partnership agreement for implementation of the Long Term 2 Enhanced Surface Water Treatment Rule and the Stage 2 Disinfectants and Disinfection Byproducts Rule

#### Background and Purpose

As part of a set of interrelated drinking water regulations that address risks from microbial pathogens and disinfectants/disinfection byproducts, EPA has promulgated new regulations – the Long Term 2 Enhanced Surface Water Treatment Rule (LT2) and the Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR). LT2 will address disease incidence associated with Cryptosporidium and other pathogenic microorganisms by targeting additional treatment at those systems at higher risk. Stage 2 DBPR focuses on limiting exposure to disinfectants/disinfection byproducts, specifically total trihalomethanes and five haloacetic acids.

Certain aspects of the rules will be effective prior to the time by which PRDOH would be required to submit a request for approval of primacy program revision related to the LT2 and the Stage 2 DBPR. Although States are not required to participate in implementing rule requirements before updating primacy, EPA and States can agree to implement the rule together during this period. In addition, EPA strongly encourages States to directly participate in early implementation; as primacy agencies for implementation of National Primary Drinking Water Regulations, States have first-hand knowledge and experience working with public water systems and can use this knowledge and experience to foster effective implementation of the rules. Accordingly, the purpose of this agreement is to set forth the respective responsibilities of PRDOH Public Water Supply Supervision Program and EPA in completing key early implementation activities under LT2 and Stage 2 DBPR.

#### Roles and Responsibilities

The two attachments are lists of key implementation activities under LT2 and Stage 2 DBPR. Each list identifies whether EPA-HQs, EPA Region 2, or PRDOH will be participating in the activity. Where only one party is identified, that party will have responsibility for leading the activity. EPA Region 2 and PRDOH agree to communicate on a periodic basis to review the progress of early implementation activities, including, but not limited to providing an opportunity to review proposed approvals of standard monitoring plans, system-specific study plans, 40/30 certifications, very small system waivers, and proposed acceptance of grandfathered data. On at least an annual basis from the effective date of LT2 and Stage 2 DBPR, EPA Region 2 and PRDOH agree to

discuss the need to amend this partnership agreement, including any roles and responsibilities.

#### **Notification**

If for whatever reason PRDOH will not be able to complete any task agreed to in this partnership agreement, the Commonwealth will notify EPA Region 2 as soon as possible to avoid confusion and implementation delays.

This agreement shall be effective until such time as PRDOH receives primary enforcement authority (primacy) for the LT2 and the Stage 2 DBPR or until such time as the parties otherwise modify this agreement.

Olga Rivera, Director

Public Water Supply Supervision Program/PRDOH

April 21 /2006

Data

Bruce Kiselica, Chief

Drinking Water Section, USEPA Region 2

Date

THE STATE OF THE PROPERTY AND THE PROPER	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 1. lde	ntify systen	ns affected b	y the Rule		
1	×			Develop a national inventory of all PWSs that have requirements under LT2ESWTR, including consecutive systems and current contact information.	
2			X	Verify consecutive system connections (as needed to assess wholesale relationships to determine compliance requirements) and contact information in Item 1. NOTE: In the absence of State participation, EPA will use the information in SDWIS to determine system connectivity and PWS contact information.	
Task 2. Con	tacting and	Interacting v	vith Syste	ms	
3	×		_	Develop a notification strategy for correspondence with systems. Design correspondence materials for the rule requirements and follow up communications.	
4			^	Contact Systems- send correspondence and handle system interactions.  Note: EPA will send mailing and receive submissions from PWSs through the LT2/Stage 2 Information Processing and Management Center (IPMC). Use of the IPMC also includes data entry support as described under Item 10 below.	

	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 3. G	uidance, Trai	ining and Ou	treach		
5	×			Develop guidance material, including fact sheets, Q&A, and rule-specific guidance manuals.	<ul> <li>Guidance manuals include: Source Water Monitoring, Microbial Laboratory, Implementation, UV, Toolbox, and Small Entity Compliance guidance manuals</li> </ul>
6	×			Develop training and outreach materials for Regional and State staff as well as for systems.	
7	×	X		Deliver Trainings.  Note: State participation would include States training the systems on the requirements of LT2ESWTR.	* ' *
8	×		$\mathbf{X}$	Provide ongoing technical support for PWSs and laboratories, including a hotline for laboratory support.	Contractor providing support.
Task 4. LT	Γ2 Requireme	nts (includes	Source V	Vater Monitoring, Grandfathering, Bin Classification)	
9	×			Conduct Laboratory Audit and PT Sample Program. Maintain a list of approved laboratories and respond to facility questions.	Contractor providing support.
10	×			Design and develop a national LT2/Stage 2 data collection system to track implementation activities (e.g. official notifications, compliance schedule, monitoring plan submission, monitoring plan approval) for all applicable systems. All primacy agencies will be able to access data and make compliance determinations using the LT2/Stage 2 data collection system. States will be able to transfer data on contacts, inventory, violations, and laboratory submissions in a SDWIS-compatible format at their discretion.	In conjunction with Stage 2 DBPR.

	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
11		•	X	Review grandfathered data, including data quality, sampling schedules and locations. Notify systems of acceptance of this data. Track all grandfathered PWSs and the systems who opt to waive all monitoring requirements and install the highest level of treatment utilizing the LT2/Stage 2 data collection system.	PRDOH will review data, EPA will provide assistance if requested.
12			X	Follow up with PWSs whose grandfathered data was not accepted.	
13			X	Review reported sampling schedules and sampling location descriptions. Follow up with systems whose planned schedules and/or locations are insufficient.	PRDOH will review schedules and sample locations and provide follow-up if needed.
14		X	X	Review and follow up on PWS challenges to monitoring results and utilizing the LT2/Stage 2 data collection system.	
15			X	Review bin classifications as reported by PWSs and notify systems of their approval.	
16		X		Perform all data management and compliance tracking using the LT2/ Stage 2 Data Collection System described in Item 17.	PRDOH will perform data management and compliance tracking. EPA will assist if
	X		X		requested.
17		X	X	Plan enforcement responses to various violations.	Region 2 will enforce until PRDOH has primacy.
Task 5. Re	eview Uncov	ered Finishe	d Water Re	servoir Plans	
18			X	Review and track PWS notifications of uncovered finished water reservoirs. Review uncovered finished water reservoir plans. Notify systems as to whether the plan has been approved or disapproved, and follow up with those systems whose plans are disapproved.	

Resident State Control of the Contro	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 6. Co	onduct Profil	ing and Bend	chmarking	Activities	
19			X	Review disinfections profiles and benchmarks submitted by PWSs proposing to make significant changes to their disinfections practices. Discuss proposed changes with systems and States, and notify system of approval.	

PRDOH		312	ige Z L	Disinfection Byproducts Rule implementation A	ctivities
	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 1. Ide	entify syste	ems affecte	d by the F	Rule	
1	- <b>×</b>	-		Develop a national inventory of all PWSs that have requirements under Stage 2 DBPR, including consecutive systems and current contact information.	
2			х	Verify consecutive system connections and contact information in Item 1.  NOTE: In the absence of State participation, EPA will use the information in SDWIS to determine system connectivity and PWS contact information.	
Task 2. Co	ntacting ar	nd Interacti	ng with S	ystems	
3			X	Develop a notification strategy for correspondence with systems. Design correspondence materials for rule requirements and IDSE follow-up requirements.	Status: Underway
4			x	Contact Systems- send correspondence and handle system interactions.  Note: For States that want support, EPA will send mailing and receive submissions from PWSs through the Information Processing and Management Center (IPMC). Use of IPMC also includes data entry support as described under Item 15 below.	Status: Underway

PRDOH				remodation by roducts Rule implementation	Activities
	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 3. G	uidance, Tr	aining and	Outreach		
5	*			Develop guidance material, including fact sheets, Q&A, and rule-specific guidance manuals.	<ul> <li>Guidance manuals include: IDSE and targeted IDSE, Operational Evaluation Levels, Consecutive Systems, Small Entity Compliance, Simultaneous Compliance, and Implementation Guidance Manuals.</li> <li>Status: Underway</li> </ul>
6	×			Develop training and outreach materials for Regional and State staff as well as for systems.	Status: Underway
7	×	×		Deliver Trainings. Note: State participation would include States training the systems on the requirements of Stage2 DBPR.	
8	×		×	Provide ongoing technical support for PWSs and laboratories.	Status: Underway
Task 4. Imp	plementatio	n of IDSE F	Requirem	ents	
9	×			Develop a triage system and checklist to verify that Initial Distribution System Evaluation (IDSE) plans and reports are complete and contain all required elements.	Status: Underway

PRDOH				remode By Toddots Rule Implementation A	Cuvilles
	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
10	×			Design and develop a national LT2/Stage 2 data collection system to track implementation activities (e.g. official notifications, compliance schedule, monitoring plan submission, monitoring plan approval) for all applicable systems. All primacy agencies will be able to access data and make compliance determinations using the LT2/Stage 2 data collection system. States will be able to transfer data on contacts, inventory, violations, and laboratory submissions in a SDWIS-compatible format at their discretion.	<ul> <li>HQ will develop notification materials, track report approvals, and provide support as needed.</li> <li>Status: Complete</li> </ul>
				*	
11			X	Review Standard Monitoring plans and reports for the IDSE using the triage system where appropriate. Notify systems of approval/disapproval and follow up with systems whose plans are incomplete or need modifications.	
12	X			Review System-Specific Study plans and reports for the IDSE, using the triage system where appropriate. Notify systems of approval and follow up with systems whose plans are incomplete or need modifications.	PRDOH does not expect system- specific study plans but will need support in reviewing such plans if submitted.
13			X	Determine and notify systems that will be required to submit TTHM and HAA5 data with their 40/30 certification. Review and track 40/30 certifications and notify systems whether their 40/30 certification is approved or they have to complete an IDSE.  Note: EPA HQ will not require systems to submit monitoring data. This will be a Regional or State determination. In the absence of State participation some systems that qualify for the waiver may be required to complete an IDSE due to EPA's lack of system-specific knowledge and information.	<ul> <li>HQ will develop a list of systems that may qualify for State review</li> <li>HQ will provide notification materials and other support as necessary.</li> <li>HQ will also track waivers granted.</li> </ul>

PRDOH		<u> </u>	age Z L	Distinection By Products Rule Implementation A	ctivities
	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
14			X	Determine whether systems serving less than 500 people have qualifying TTHM/HAA5 data for the Very Small System (VSS) Waiver. Notify systems <500 that do not qualify. Note: In the absence of State participation, some systems that qualify for the waiver may be required to complete an IDSE due to EPA's lack of system-specific knowledge and information.	<ul> <li>HQ will develop a list of systems&lt;500 that may qualify for State review</li> <li>HQ will provide notification materials and other support as necessary.</li> <li>HQ will also track waivers granted.</li> </ul>
15			X	Perform all data management and compliance tracking using the LT2/Stage 2 data collection system described in Item 10.  Note: For States that use the IPMC described in Item 4 above, an EPA Contractor will perform all basic data entry in the tracking system so that States only have to track review/approvals IDSE submissions.	Puerto Rico DOH function will be dealing with approvals/disapprovals. EPA will provide assistance if requested.
16		X	X	Plan enforcement responses to various violations.	Region 2 will enforce until PRDOH has primacy.

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discuss the need to amend this partnership agreement, including any roles and responsibilities.

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Olga Rivera, Director
Public Water Supply Supervision Program/PRDOH

Bruce Kiselica, Chief Drinking Water Section, USEPA Region 2 Date

	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 1.	Identify systen	ns affected b	y the Rule		
1	×			Develop a national inventory of all PWSs that have requirements under LT2ESWTR, including consecutive systems and current contact information.	
2			X	Verify consecutive system connections (as needed to assess wholesale relationships to determine compliance requirements) and contact information in Item 1. NOTE: In the absence of State participation, EPA will use the information in SDWIS to determine system connectivity and PWS contact information.	
Task 2.	Contacting and	d Interacting	with Syste	ems	
3	×		X	Develop a notification strategy for correspondence with systems. Design correspondence materials for the rule requirements and follow up communications.	
4			X	Contact Systems- send correspondence and handle system interactions.  Note: EPA will send mailing and receive submissions from PWSs through the LT2/Stage 2 Information Processing and Management Center (IPMC). Use of the IPMC also includes data entry support as described under Item 10 below.	

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EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Guidance, Trai	ining and Ou	itreach		
×			Develop guidance material, including fact sheets, Q&A, and rule-specific guidance manuals.	<ul> <li>Guidance manuals include: Source Water Monitoring, Microbial Laboratory, Implementation, UV, Toolbox, and Small Entity Compliance guidance manuals</li> </ul>
×			Develop training and outreach materials for Regional and State staff as well as for systems.	
×	X	<b>A</b>	Deliver Trainings.  Note: State participation would include States training the systems on the requirements of LT2FSWTR	Need to discuss with Olga
×		X	Provide ongoing technical support for PWSs and laboratories, including a hotline for laboratory support.	Contractor providing support.
.T2 Requirem	ents (include	es Source \	Water Monitoring, Grandfathering, Bin Classification)	
×			Conduct Laboratory Audit and PT Sample Program. Maintain a list of approved laboratories and respond to facility questions.	Contractor providing support.
*			Design and develop a national LT2/Stage 2 data collection system to track implementation activities (e.g. official notifications, compliance schedule, monitoring plan submission, monitoring plan approval) for all applicable systems. All primacy agencies will be able to access data and make compliance determinations using the LT2/Stage 2 data collection system. States will be able to transfer data on contacts, inventory, violations, and laboratory submissions in a SDWIS-compatible format at their discretion.	In conjunction with Stage 2 DBPR.
	Head- quarters  duidance, Trai	Head-quarters Offices  duidance, Training and Out	Head- Regional quarters Offices  suidance, Training and Outreach	Head-quarters Offices  Inidiance, Training and Outreach  X Develop guidance material, including fact sheets, Q&A, and rule-specific guidance manuals.  Develop training and outreach materials for Regional and State staff as well as for systems.  Deliver Trainings. Note: State participation would include States training the systems on the requirements of LT2ESWTR. Provide ongoing technical support for PWSs and laboratories, including a hotline for laboratory support.  T2 Requirements (includes Source Water Monitoring, Grandfathering, Bin Classification)  X Design and develop a national LT2/Stage 2 data collection system to track implementation activities (e.g. official notifications, compliance schedule, monitoring plan submission, monitoring plan approval) for all applicable systems. All primacy agencies will be able to ransfer data on contacts, inventory, violations, and laboratory submissions in a



	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
11	<b>?</b> /	?	2	Review grandfathered data, including data quality, sampling schedules and locations. Notify systems of acceptance of this data. Track all grandfathered PWSs and the systems who opt to waive all monitoring requirements and install the highest level of treatment utilizing the LT2/Stage 2 data collection system.	PRDOH will need to determine if IPMC is to be used.
12			X	Follow up with PWSs whose grandfathered data was not accepted.	
13		?	3	Review reported sampling schedules and sampling location descriptions. Follow up with systems whose planned schedules and/or locations are insufficient.	PRDOH will need to determine if IPMC is to be used.
14		X	X	Review and follow up on PWS challenges to monitoring results and utilizing the LT2/Stage 2 data collection system.	
15			X	Review bin classifications as reported by PWSs and notify systems of their approval.	
16		X	?	Perform all data management and compliance tracking using the LT2/ Stage 2 Data Collection System described in Item 17.	Will check with Olga for IPMC use. State function will be dealing with approvals/disapprovals. Data management portion is what is in question. Region will do compliance tracking?
17		X	X	Plan enforcement responses to various violations.	Region 2 will enforce until PRDOH has primacy.
Task 5. R	eview Unco	overed Finish	ed Water Re	eservoir Plans	
18		7	X	Review and track PWS notifications of uncovered finished water reservoirs. Review uncovered finished water reservoir plans. Notify systems as to whether the plan has been approved or disapproved, and follow up with those systems whose plans are disapproved.	

# PRDOH EPA

# Long Term 2 Enhanced Surface Water Treatment Rule Implementation Activities

	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
ask 6. Co	onduct Profil	ling and Bend	chmarking	Activities	
19			Y	Review disinfections profiles and benchmarks submitted by PWSs proposing to make significant changes to their	

PRDOH		<u> </u>	ige Z L	distillection Byl Toddets (vale implementation)	Addivides
.,,,,,	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
Task 1. lo	lentify syste	ems affecte	d by the F	Rule	
1	×			Develop a national inventory of all PWSs that have requirements under Stage 2 DBPR, including consecutive systems and current contact information.	
2			X	Verify consecutive system connections and contact information in Item 1.  NOTE: In the absence of State participation, EPA will use the information in SDWIS to determine system connectivity and PWS contact information.	
Task 2. C	ontacting a	nd Interact	ing with S	Systems	
3			X	Develop a notification strategy for correspondence with systems. Design correspondence materials for rule requirements and IDSE follow-up requirements.	Status: Underway
4			x	Contact Systems- send correspondence and handle system interactions.  Note: For States that want support, EPA will send mailing and receive submissions from PWSs through the Information Processing and Management Center (IPMC). Use of IPMC also includes data entry support as described under Item 15 below.	Status: Underway

PRDOH					Annotation
	EPA Head-	EPA Regional	States	Activity/Function	Amotation
	quarters	Offices			
Task 3. G	uidance, Tr	aining and	Outreach		
5	×			Develop guidance material, including fact sheets, Q&A, and rule-specific guidance manuals.	<ul> <li>Guidance manuals include: IDSE and targeted IDSE, Operational Evaluation Levels, Consecutive Systems, Small Entity Compliance,</li> </ul>
					Simultaneous Compliance, and Implementation Guidance Manuals.  • Status: Underway
6	*			Develop training and outreach materials for Regional and State staff as well as for systems.	Status: Underway
			$\sim$	Andrew Company of the	
7	×	×	(Z)	Deliver Trainings.  State participation would include States training the systems on the requirements of Stage2 DBPR.	Need to discuss with Olga.
_			×	Provide ongoing technical support for PWSs and laboratories.	<ul> <li>Status: Underway</li> </ul>
8	×		^	Trovide engening teemment in	
			*		
Task 4.	Implementa	tion of IDS	E Requirer	nents	
9	×			Develop a triage system and checklist to verify that Initial Distribution System Evaluation (IDSE) plans and reports are complete and contain all required elements.	Status: Underway

PRDOH	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
10	×			Design and develop a national LT2/Stage 2 data collection system to track implementation activities (e.g. official notifications, compliance schedule, monitoring plan submission, monitoring plan approval) for all applicable systems. All primacy agencies will be able to access data and make compliance determinations using the LT2/Stage 2 data collection system. States will be able to transfer data on contacts, inventory, violations, and laboratory submissions in a SDWIS-compatible format at their discretion.	<ul> <li>+HQ will develop notification materials, track report approvals, and provide support as needed.</li> <li>Status: Complete</li> </ul>
				· · · · · · · · · · · · · · · · · · ·	
11			X	Review Standard Monitoring plans and reports for the IDSE using the triage system where appropriate. Notify systems of approval/disapproval and follow up with systems whose plans are incomplete or need modifications.	
12	X			Review System-Specific Study plans and reports for the IDSE, using the triage system where appropriate. Notify systems of approval and follow up with systems whose plans are incomplete or need modifications.	PRDOH does not expect system- specific study plans but will need support in reviewing such plans if submitted.
13			X	Determine and notify systems that will be required to submit TTHM and HAA5 data with their 40/30 certification. Review and track 40/30 certifications and notify systems whether their 40/30 certification is approved or they have to complete an IDSE.  Note: EPA HQ will not require systems to submit monitoring data. This will be a Regional or State determination. In the absence of State participation some systems that qualify for the waiver may be required to complete an IDSE due to EPA's lack of system-specific knowledge and information.	<ul> <li>HQ will develop a list of systems that may qualify for State review</li> <li>HQ will provide notification materials and other support as necessary.</li> <li>HQ will also track waivers granted.</li> </ul>

PRDOH					
	EPA Head- quarters	EPA Regional Offices	States	Activity/Function	Annotation
14			X	Determine whether systems serving less than 500 people have qualifying TTHM/HAA5 data for the Very Small System (VSS) Waiver. Notify systems <500 that do not qualify. Note: In the absence of State participation, some systems that qualify for the waiver may be required to complete an IDSE due to EPA's lack of system-specific knowledge and information.	<ul> <li>HQ will develop a list of systems&lt;500 that may qualify for State review</li> <li>HQ will provide notification materials and other support as necessary.</li> <li>HQ will also track waivers granted.</li> </ul>
15		?	?	Perform all data management and compliance tracking using the LT2/Stage 2 data collection system described in Item 10.  Note: For States that use the IPMC described in Item 4 above, an EPA Contractor will perform all basic data entry in the tracking system so that States only have to track review/approvals IDSE submissions.	Will need to determine if IPMC will be used. State function will be dealing with approvals/disapprovals. The data management portion is what is in question. Region will do compliance tracking?
16	<u> </u>	X	X	Plan enforcement responses to various violations.	Region 2 will enforce until PRDOH has primacy.





June 29, 2006

Olga I. Rivera, MSA, Director Potable Water Division Department of Health PO Box 70184 San Juan, Puerto Rico 00936-8184

Dear Mrs. Rivera:

Attached you will find the information required to begin with the activity of compliance with the new rule for potable water "Long Term 2 Enhanced Surface Water Treatment Rule" (LT2ESWTR).

Should you need any additional information or have any question or comment, please do not hesitate to contact us.

Regards,

Loda. Diana Hernández López

Laboratory Supervisor

Cc: William Ramos

Production and Technical Manager

Thames Water Puerto Rico, Inc.

PO Box 373 Sabana Hoyos, PR 00668-0373

T 787-881-8040 F 787-881-1150

I www.thames-water.com

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## Long Term 2 Enhanced Surface Water Treatment Rule Intent to Provide Maximum Treatment - Example Notice

Public Water Systems (PWSs) who choose to provide the maximum level of treatment for Cryptosporidium applicable to their plant type rather than start source water monitoring must submit written notification no later than the date the PWS is otherwise required to submit a sampling schedule for monitoring. Alternatively, a PWS may choose to stop sampling at any point after it has initiated monitoring if it provides written notification that it will provide this level of treatment. This form is an example of the necessary written notification. PWSs must install and operate technologies to provide this level of treatment by their applicable treatment compliance date.

PWS Informati	ion
PWS Name: North Coast Superaqueduct Project	ct PWSID: 2000
PWS Address: RD. 663 KM 1.6 Sabana Hoyos, A	
Email Address: william.ramos@thameswater.co.ul	S. diana hernandoz@hhamaret
Water Treatment Plant Name: North Coast Superago	leduct Project
Water System Facility ID: Not available	i
Type of system that will be providing maximum treatment in	stead of conducting monitoring:
Elitered system providing a total of at least 5.5-log of tra 141.701 (d)(1)].	
Unfiltered system providing a total of at least 3-log Cry/141.701 (d)(2)]	otosporidium inactivation [40 CFR part
Planned date of treatment compliance: October 2006	
Monitoring	parameters: Cryptosporidium,
Planned treatment to achieve compliance: Frequency: I sample / month Monthly on the second Wednesday of each m	E. coli, Turbidity
	that my PWS is required to meet and am
Yes No I have discussed these requirements with	a State or U.S. EPA representative
Signature: Sime Menine Loge	Date: 6/29/06
Name (print) Diana Hernandez Lopez	Phone: (787) 881-8040
C: William Ramos	

This notice may be submitted using one of the following options:

- As an email attachment sent to <a href="mailto:stage2mdbp@epa.gov">stage2mdbp@epa.gov</a>
- By mail or fax to the following:

LT2ESWTR and Stage 2 DBPR

P.O. Box 98 Dayton, OH 45401

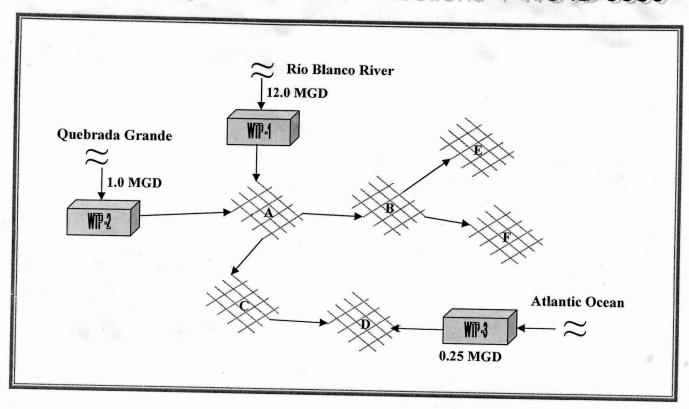
FAX: (937)-586-6557

## Long Term 2 Enhanced Surface Water Treatment Rule Sampling Location Worksheet

Public Water System (PWS) Name: Nort	h Coast Pws	ID: _2000
Superaqueduct Water Treatment Plant Name: N		Facility ID: Not available
1. Source Name	Raw Water from "Rio Grande de Arecibo	on.
2. Source Type Flowing stream, Lake/Reservoir, or GWUDI	Flowing stream/ Reservoir	
Source Water Sampling     Location Provide State assigned     number	Not available	
4. Usage All year, Part-year, or Emergency (Describe conditions, constraints, months in operation)	All year	,
5. Proportion of typical average daily flow	100 %	%
6. Pretreatment Practices Presedimentation, Bank filtration, or Off-stream storage	Presedimentation Off-stream storage	
7. Recycling Practices (if applicable) Description and return flow location	Not applicable	
8. Chemical Pretreatment (Indicate location on plant schematic)	See schematic	
9. Sample Compositing Procedure (if applicable) Blended sample tap, Composite sample, or Weighted	Not applicable	
•	770	

Use additional sheets or reverse side to provide more information

# Río Blanco Systems Interconnections PWS ID 5386



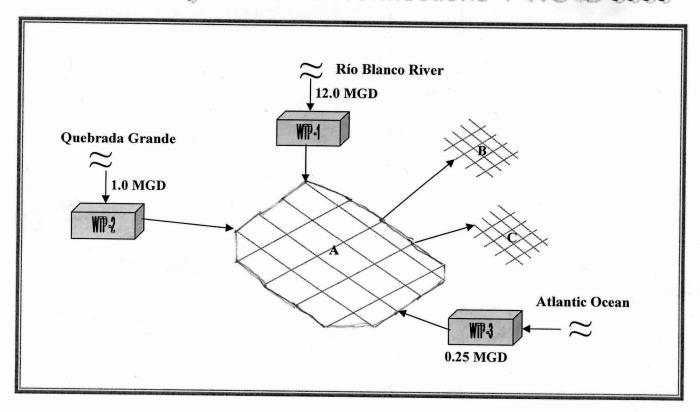
# A. Distribution Systems

System	Name	PWS	Type	Population	Comments
A	Naguabo	5386	Surface	135,864	Comments
В	Humacao	5386	Surface	133,001	
C	Vieques Island	5386	Surface		All wells are stand-by.
D	Culebla Island	5386	Surface		Desalination Plant are stand-by
E	Cardina Health Manufacturing	636066	Surface	120	stand-by
F	Novartis/ExLax	636086	Surface	100	

#### **B.** Filtration Plants

WTP	Name	System	PWS	Production MGD	Comments
_1	Río Blanco	Naguabo- Río Blanco	5386	12.0	
2	El Duque	Naguabo- Río Blanco	5386	1.0	
3	Culebra	Naguabo- Río Blanco	5386	0.25	Desalination Plant are stand-by

# Río Blanco Systems Interconnections PWS ID 5386



#### A. Distribution Systems

System	Name	PWS	Type	Population	Comments
A	Naguabo	5386	Surface	135,864	
В	Cardina Health Manufacturing	636066	Surface	120	
C	Novartis/ExLax	636086	Surface	100	

## **B.** Filtration Plants

WTP	Name	System	PWS	Production MGD	Comments
_1	Río Blanco	Naguabo- Río Blanco	5386	12.0	
2	El Duque	Naguabo- Río Blanco	5386	1.0	
3	Culebra	Naguabo- Río Blanco	5386	0.25	Desalination Plant are stand-by



Elba López Fuentes <elbalopez@salud.gov.pr> 07/10/2006 03:31 PM

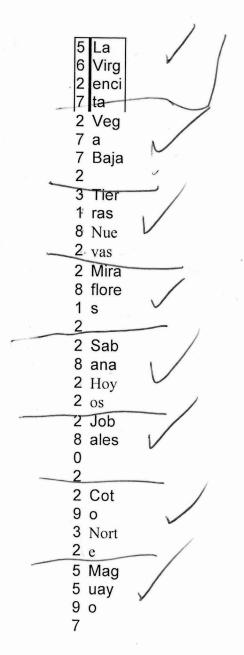
To Michael Lowy/R2/USEPA/US@EPA

CC

bcc

Subject From Zuleima

Systems that are part of the combine distribution system of schedule 1, stage 2:



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Zuleima Rodríguez
División Agua Potable
Programa Salud Ambiental
elbalopez@salud.gov.pr
787-777-0150

# ESTADO LIBRE ASOCIADO DE PUERTO RICO Departamento de Salud

División de Agua Potable



5 de mayo de 2006

Ing. Rafael Lama, Director Ejecutivo Cumplimiento y Control de Calidad Autoridad de Acueductos y Alcantarillados Apartado 7066, Bo. Obrero Station Santurce, Puerto Rico 00916

## Re: Stage 2 Disinfectants/Disinfection Byproducts Rule (Stage 2 DBPR)

Estimado ingeniero Lama:

El pasado 4 de enero de 2006 la Agencia de Protección Ambiental Federal (EPA) promulgó la reglamentación de referencia. El objetivo de la misma es identificar aquellos sistemas que representan un riesgo de salud pública por las altas concentraciones de los subproductos de desinfección (DBP's) y el que se realicen los cambios requeridos para lograr cumplimiento con los niveles máximos de contaminantes establecidos.

Durante los días 28 y 29 de marzo personal de su agencia, de la EPA y del Departamento de Salud asistimos a un adiestramiento sobre la implementación de esta regla, específicamente todo lo relacionado con aquellos requisitos iniciales y sus respectivas fechas de cumplimiento, los cuáles son el propósito de este comunicado.

La Stage 2 DBPR requiere de una Evaluación Inicial del Sistema de Distribución (IDSE), realizada una sola vez por el sistema, la cual pretende el identificar lugares (puntos) de muestreo para los DBP's, adicionales a los existentes, con potencial de reflejar altas concentraciones de estos subproductos. El nuevo enfoque de esta reglamentación es proveer una protección consistente y equitativa a través de todo el sistema de distribución eliminando la ocurrencia de "picos" de altas concentraciones de DBP's. Los sistemas utilizarán los resultados del IDSE, en conjunto con los datos del muestreo de cumplimiento de la reglamentación vigente (Stage 1 DBPR) para seleccionar unos nuevos puntos de muestreo para DBP's bajo la Stage 2 DBPR. Eventualmente, el cumplimiento estará basado en los resultados que reflejen cada punto (Locational Running Annual Average, LRAA) en lugar del promedio de todos los puntos del sistema (Running Annual Average, RAA).

La fecha de cumplimiento con esta evaluación inicial dependerá del tamaño del sistema y de la población del sistema más grande en caso que el sistema pertenezca a un sistema combinado. Hay cuatro (4) opciones para cumplir con este muestreo inicial. Las mismas son:

#### Página 2 Stage 2 DBPR

- 1. **Dispensa a sistemas < 500 personas**. Sistemas pequeños que hayan muestreado bajo el Stage 1 DBPR, no se les requiere cumplir con los requisitos del IDSE. El sistema no tiene que cumplir con estos requisitos a menos que el Departamento de Salud informe lo contrario.
- 2. **Certificación 40/30**. Sistemas que no tengan violaciones de muestreo de THM y HAA5 bajo la Stage 1 DBPR y que ninguna muestra excede 0.040 mg/L para THM ó 0.030 mg/L para HAA5 durante 8 trimestres consecutivos, son elegibles para esta certificación. El sistema debe someter la certificación con la evidencia de cumplimiento en o antes de la fecha estipulada.
- 3. **Muestreo Estándar**. Requiere muestreo de trihalometanos (THM) y ácidos halocéticos (HAA5) por un (1) año a intervalos regulares de tiempo. La cantidad de puntos de muestreo a analizar depende del tipo de fuente y del tamaño del sistema. Los sistemas deben preparar y someter para aprobación al Departamento de Salud un Plan de Muestreo.
- **4. Estudios específicos del sistema.** Los sistemas pueden utilizar otra información para determinar los puntos de muestreo, por ejemplo modelos hidráulicos o resultados anteriores. Esta opción es para sistemas que tienen información extensa y otros recursos para seleccionar puntos de muestreo.

La siguiente tabla detalla las fechas de cumplimiento con este requisito.

Itinerario	Población	Someter Certificación 40/30, Plan de Muestreo Estándar, o Estudios específicos del sistema	Completar el Muestreo Estándar, o Estudios específicos del sistema	Someter Informe
1	≥100,000	1 octubre 2006	30 septiembre 2008	1 enero 2009
2	50,000- 99,999	1 abril 2007	31 marzo de 2009	1 julio 2009
3	10,000- 49,999	1 octubre 2007	30 septiembre 2009	1 enero 2010
4	<10,000	1 abril 2008	31 marzo de 2010	1 julio 2010

Para los sistemas bajo el Itinerario #1, en o antes del 30 de septiembre de 2007 este Departamento debe notificar al sistema de la aprobación/desaprobación del Plan de Muestreo Estándar, la certificación 40/30 o los estudios específicos o en su defecto notificar al sistema que no ha completado la revisión.

Es importante resaltar que aquellos sistemas que pertenecen a sistemas combinados el itinerario de cumplimiento está basado en la población del sistema más grande en el sistema combinado.

Página 3 Stage 2 DBPR

La División Agua Potable ha identificado los sistemas de la AAA que correspondientes al Itinerario #1. Estos están detallados en la Tabla adjunta. Además, dicha tabla identifica la cantidad de lugares adicionales de muestreo a ser identificados y la frecuencia de muestreo.

Para que el sistema obtenga la aprobación del Plan de Muestreo Estándar debe someter el mismo con los elementos mínimos requeridos y los puntos deben ser seleccionados basados en unos criterios específicos. Para su conveniencia estamos sometiendo una copia adicional del paquete completo de información escrita ofrecida durante el adiestramiento, el cual detalla estos requisitos. Además, como parte del taller del Seminario de Agua Potable a efectuarse el 23 de mayo de 2006 estaremos ofreciendo nuevamente parte de este adiestramiento. También estamos recomendando el siguiente documento preparado por la EPA y publicado en enero de 2006, Initial Distribution System Evaluation Guidance Manual for the Final Stage 2 Disinfectants and Disinfection Byproducts, EPA 815-B-06-002.

Este Departamento apercibe a la AAA que las acciones de *enforcement* correspondientes al incumplimiento con estos requisitos iniciales están bajo la jurisdicción de la EPA.

De tener alguna pregunta, favor de comunicarse al 787-777-0150/0151.

Cordialmente,

Olga I. Rivera, Directora División de Agua Potable

c: Sra. Irma M. López; Lcdo. Jorge Flechas; Coordinadores DAP

# STAGE 2

#### Sistemas AAA bajo Itinerario #1

A. Por población

Sistema	PWS	Fuente	Población	Frecuencia de	Total de	Descri	pción del pun	to de mu	estreo
				muestreo en 1 año	sitios a muestrear	Cerca del punto de entrada	Tiempo residencia promedio	THM Altos	HAA5 Altos
Metropolitano	2591	Superficial	1,645,944	Cada 60 días	32	6	8	10	8
Ponce Urbano	3824	Superficial	242,748	Cada 60 días	16	3	4	5	4
Mayagüez Urbano	3283	Superficial	198,132	Cada 60 días	16	3	4	5	4
Aguadilla Urbano	3293	Superficial	190,872	Cada 60 días	16	3	4	5	4
Caguas Norte	5086	Superficial	158,064	Cada 60 días	16	3	4	5	4
Arecibo Urbano	2652	Superficial	128,300	Cada 60 días	16	3	4	5	4
Río Blanco	5386	Superficial	124,836	Cada 60 días	16	3	4	5	4
El Yunque	5296	Superficial	102,184	Cada 60 días	16	3	4	5	4

B. Por ser parte de un sistema combinado que sirve a 100,000 personas o más.

Sistema	PWS	Fuente	Población	Frecuencia	Total de	Descri	pción del pun	to de mu	estreo
				en 1 año	sitios a muestrear	Cerca del Punto de entrada	Tiempo residencia promedio	THM Altos	HAA5 Altos
Arecibo Urbano	2652	Superficial	128,300	Cada 60 días	16	3	4	5	4
La Virgencita	5627	Superficial	66,208	Cada 60 días	16	3	4	5	4
Vega Baja	2772	Superficial	47,072	Cada 60 días	8	1	2	3	2
Tierras Nuevas	3182	Subterráneo (*)	16,064	Cada 60 días	8	1	2	3	2
Miraflores	2812	Subterráneo (*)	5,128	Cada 90 días	4		1	2	1
Sabana Hoyos	2822	Subterráneo (*)	4,976	Cada 90 días	4		1	2	1
Jobales	2802	Subterráneo (*)	4,096	Cada 90 días	4	GOVE AT MAKES	1	2	1
Coto Norte	2932	Subterráneo (*)	1,520	Cada 90 días	2	1		1	
Maguayo	5597	Subterráneo	46,864	Cada 90 días	6	1	1	2	2
Dorado Urbano	5607	Subterráneo	36,908	Cada 90 días	6	1	1	2	2
Barceloneta	2722	Subterráneo	33,964	Cada 90 días	6	1	1	2	2
Manatí East	3262	Subterráneo	29,128	Cada 90 días	6	1	1	2	2
Santana	2832	Subterráneo	19,776	Cada 90 días	6	1	1	2	2
Garrochales	2782	Subterráneo	14,384	Cada 90 días	6	1	1	2	2
Florida	2732	Subterráneo	14,084	Cada 90 días	6	1	1	2	2
Pugnado	2972	Subterráneo	13,560	Cada 90 días	6	1	1	2	2
Bajadero	3222	Subterráneo	5,848	Cada 90 días	2	2,■.	-	1	1
Cimarrona	3832	Subterráneo	2,308	Cada 90 días	2	-	-	1	1

<sup>\*</sup> Todos los pozos del sistema están fuera de operación, por lo tanto el agua que recibe el sistema proviene en su totalidad de una fuente superficial..

delete-Trom L T2

# PRASA Systems Interconnections with Super Aqueduct of North Coast

## A. Systems

System	Name	PWS	Type	Population	Comments
A	Arecibo Urbano	2652	Surface	128,300	
В	Bajadero	3222	Ground	5,848	
С	Santana	2832	Ground	19,776	
D	Miraflores	2812	Ground	5,128	All wells are out of service.
E	Garrochales	2782	Ground	14,384	
F	Sabana Hoyos	2822	Ground	4,976	All wells are out of service.
G	Jobales	2802	Ground	4,096	All wells are out of service.
H	Cimarrona	3832	Ground	2,308	
I	Florida	2732	Ground	14,084	
J	Barceloneta	2722	Ground	33,964	
K	Tierras Nuevas	3182	Ground	16,064	All wells are out of service.
L	Manatí East	3262	Ground	29,128	
M	Coto Norte	2932	Ground	1,520	All wells are out of service.
N	Vega Baja	2772	Surface	47,072	
0	Maguayo	5597	Ground	46,864	1
P	Dorado Urbano	5607	Ground	36,908	
Q	Pugnado	2972	Ground	13,560	
R	La Virgencita	5627	Surface	66,208	Filtration plant out of service
S	Metropolitano	2591	Surface	1,645,944	•
T	Caguas Norte	5086	Surface	158,064	

#### **B. Filtration Plants**

add to LT2 delete\_12 from

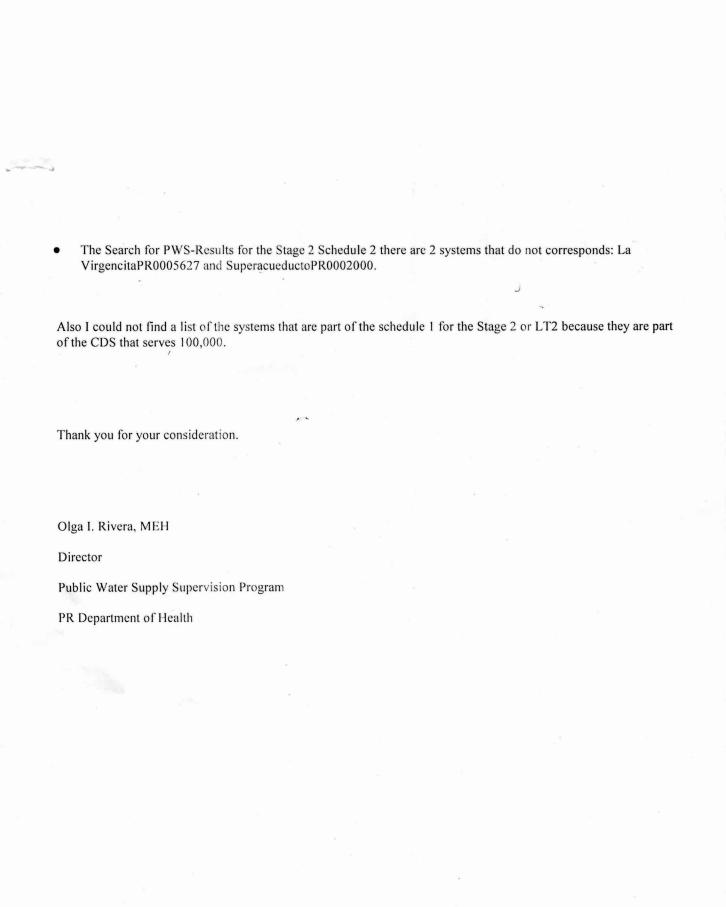
WTP	Name	System	PWS	Production MGD	Comments
1	Arecibo WTP	Arecibo Urbano	2652	3.0	
-2	Superacueducto WTP	Super Aqueduct of North Coast	2000	100	
3	Vega Baja WTP	Vega Baja (	2772	2.0	
4	La Virgencita WTP	La Virgencita	5627	6	Out of service
5	La Plata	Metropolitano	2591	70	
6	Guaynabo	Metropolitano	2591	25	
7	Sergio Cuevas	Metropolitano	2591	105	
8	Canóvanas	Metropolitano	2591	10	
9	Carolina	PF Bo. Trujillo Bajo Carolina	116051	2	Non PRASA filtration plant
10	Caguas Norte WTP	Caguas Norte	5086	6	

#### C. Distribution Tanks

TK	Name	Capacity MGD	
1	Miraflores	3.5	
2	Miraflores	3.5	
3	Sabana Hoyos	1.5	
4	Jobales	1.0	
5	Manatí	2.5	
6	Manatí	2.5	
7	Roche	0.75	
8	Vega Baja	2.5	
9	Vega Baja	2.5	
10	Dorado	2.0	
11	Dorado	2.0	
12	Tanque Bayamón	10	
13	Tanque Bayamón	10	

Flizabeth Michael Lowy/R2/USEPA/US@EPA McDermott/DC/USEPA/US CC 06/30/2006 03:17 PM bcc Subject Fw: Errors in compliance schedules can you take care of this one? thanks Liz McDermott Team Leader, M-DBP Team Office of Ground Water and Drinking Water **Environmental Protection Agency** 202-564-1603 Forwarded by Elizabeth McDermott/DC/USEPA/US on 06/30/2006 03:17 PM Olga Rivera Gutierrez <orivera@salud.gov.pr> To stage2mdbp@EPA 06/30/2006 02:41 PM Zuleima Rodríguez Hernández <zurodriguez@salud.gov.pr>, Oneida Santiago Sepúlveda <onsantiago@salud.gov.pr> TOK > 1/2 of stage 2 school 2 Subject Errors in compliance schedules I was reviewing the Collection System and found the following: Compliance group 1 there are 2 systems missing (Ponce UrbanoPR0003824 and SuperacueductoPR0002000) Compliance group 2 there are 1 system missing (Vega Baja PR0002772) and 1 system not from group 2 (SuperacueductoPR 0002000) OR) Must delete Listed as: sched 3 for I was reviewing the Reports: CDS Information and found the following: For compliance Schedule 1 there is one system missing (SuperacueductoPR0002000: only for LT2 not for For compliance Schedule 2 there is one system missing (Vega Baja PR0002772; only for LT2 not for Stage2). The system SuperacueductoPR0002000 does not correspond to LT2 or Stage 2. The system La VirgencitaPR0005627 does not correspond to Stage 2, yes for LT2.

was reviewing the Tracking System and found the following:





Michael Lowy/R2/USEPA/US 07/11/2006 10:28 AM

To Oneida Santiago Sepúlveda <onsantiago@salud.gov.pr>

СС

bcc

Subject Re: e-mail address

Onieda:

Below are the questions I had sent to Zuleima .....

Zuleima:

I need further clarification to make the requested changes.

First, my understanding is that you want the following:

1. Stage 2 does not apply to the Superacueducto so you want to have this system removed from Stage 2 requirements. Can you clarify why Stage 2 does not apply?

2. Superacueducto should be listed as Schedule 1 for LT2, because it is currently listed as Schedule 2 (for both rules)

3. Ponce Urbano needs to be added to Schedule 1 for LT2 and Stage 2 (altho I have this system as being on Schedule 1 for both rules)

4. Vega Baja should be listed as on Schedule 2 for LT2 only, Stage 2 does not apply (currently I have this on Schedule 3 for both rules). Can you clarify why this is so as well?

5. Superacueducto is listed as a Schedule 2 and needs to be changed to Schedule 1, applicable for LT2 only (the above fix shold take care of that, I assume)

6. La Virgencita should be listed for Schedule 2, LT2 only, again, Stage 2 does not apply to this system?

I guess if you can confirm what I believe you want, I can go from there.

thanks

Oneida Santiago Sepúlveda <onsantiago@salud.gov.pr>



Oneida Santiago Sepúlveda <onsantiago@salud.gov.pr> 07/11/2006 10:30 AM

To Michael Lowy/R2/USEPA/US@EPA

CC

Subject e-mail address

Hi Lowy:

In case you have problem with my e-mail address. You may reply this message with your questions.

Oneida Santiago Oficial de Salud Ambiental Sección de Cumplimiento Joes hat serve a bob.

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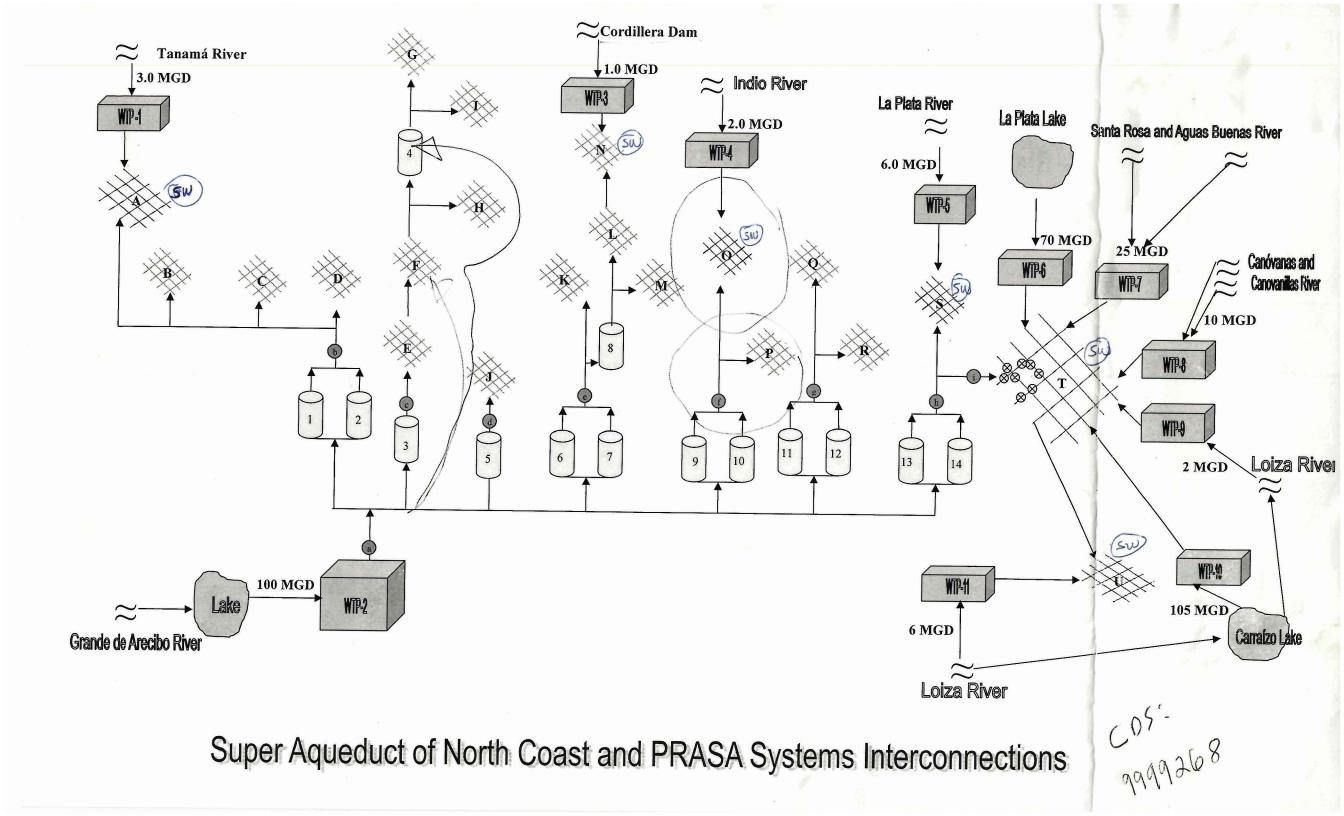
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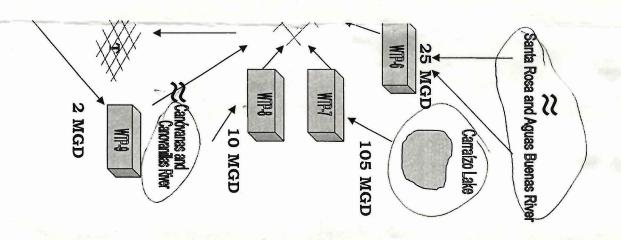
# PRASA Systems Interconnections with Super Aqueduct of North Coast

### A. Systems

System	Name	PWS	Type	Population	Comments	
A	Arecibo Urbano	2652	Surface	128,300		
В	Bajadero	3222	Ground	5,848		
С	Santana	2832	Ground	19,776		
D	Miraflores	2812	Ground	5,128	All wells are stand-by.	
E	Garrochales	2782	Ground	14,384		
F	Sabana Hoyos	2822	Ground	4,976	All wells are stand-by.	
G	Jobales	2802	Ground	4,096	All wells are stand-by.	
→ H	Cimarrona	3832	Ground	2,308		
I	Florida	2732	Ground	14,084		
J	Barceloneta	2722	Ground	33,964		
K	Tierras Nuevas	3182	Ground	16,064	All wells are stand-by.	
L	Manatí East	3262	Ground	29,128		
M	Coto Norte	2932	Ground	1,520	All wells are stand-by.	
N	Ciales	2752	Surface			
0	Vega Baja	2772	Surface	47,072		
P	Pugnado	5597	Ground	46,864		
Q	Dorado Urbano	5607	Ground	36,908		
- R	Maguayo	2972	Ground	13,560		
S	La Virgencita	5627	Surface	66,208	All wells are stand-by.	
T	Metropolitano	2591	Surface	1,645,944	,	
U	Caguas Norte	5086	Surface	158,064		

## **B.** Filtration Plants

WTP	Name	System	PWS	Production MGD	Comments
1	Arecibo WTP	Arecibo Urbano	2652	3.0	
2	Superacueducto WTP	Super Aqueduct of North Coast	2000	100	
3	Cordillera	Ciales Urbano	2752	1.0	
4	Vega Baja WTP	Vega Baja	2772	2.0	8888
5	La Virgencita WTP	La Virgencita	5627	6	Stand-by
6	La Plata	Metropolitano	2591	70	
7	Guaynabo	Metropolitano	2591	25	
8	Canóvanas	Metropolitano	2591	10	
9	Carolina	Metropolitano	116051	2	Non PRASA filtration plant
10	Sergio Cuevas	PF Bo. Trujillo Bajo Carolina	2591	105	praire
11	Caguas Norte WTP	Caguas Norte	5086	6	



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# PRASA Systems Interconnections with Super Aqueduct of North Coast

#### A. Systems

System	Name	PWS	Туре	Population	Comments
A	Arecibo Urbano	2652	Surface	128,300	
В	Bajadero	3222	Ground	5,848	
C	Santana	2832	Ground	19,776	
D	Miraflores	2812	Ground	5,128	All wells are out of service.
E	Garrochales	2782	Ground	14,384	100
F	Sabana Hoyos	2822	Ground	4,976	All wells are out of service.
G	Jobales	2802	Ground	4,096	All wells are out of service.
H	Cimarrona	3832	Ground	2,308	
I	Florida	2732	Ground	14,084	
J	Barceloneta	2722	Ground	33,964	
K	Tierras Nuevas	3182	Ground	16,064	All wells are out of service.
L	Manatí East	3262	Ground	29,128	
M	Coto Norte	2932	Ground	1,520	All wells are out of service.
N	Vega Baja	2772	Surface	47,072	
0	Maguayo	5597	Ground	46,864	
P	Dorado Urbano	5607	Ground	36,908	
Q	Pugnado	2972	Ground	13,560	
R	La Virgencita	5627	Surface	66,208	Filtration plant out of service
S	Metropolitano	2591	Surface	1,645,944	-72
T	Caguas Norte	5086	Surface	158,064	

#### **B.** Filtration Plants

WTP	Name	System	PWS	Production MGD	Comments
1	Arecibo WTP	Arecibo Urbano	2652	3.0	
2	Superacueducto WTP	Super Aqueduct of North Coast	2000	100	N. 1
3	Vega Baja WTP	Vega Baja	2772	2.0	
4	La Virgencita WTP	La Virgencita	5627	6	Out of service
5	La Plata	Metropolitano	2591	70	
6	Guaynabo	Metropolitano	2591	25	
7	Sergio Cuevas	Metropolitano	2591	105	
8	Canóvanas	Metropolitano	2591	10	
9	Carolina	PF Bo. Trujillo Bajo Carolina	116051	2	Non PRASA filtration plant
10	Caguas Norte WTP	Caguas Norte	5086	6	Paul

- What systems have own source/plant? Not id don schematic

- Population of Superaweducto = 750k

Need location of booster stations

Does Euperaweducto take Stage & samples?

## C. Distribution Tanks

TK	Name	Capacity MGD	
1	Miraflores	3.5	
2	Miraflores	3.5	
3	Sabana Hoyos	1.5	
4	Jobales	1.0	
5	Manatí	2.5	
6	Manatí	2.5	
7	Roche	0.75	
8	Vega Baja	2.5	
9	Vega Baja	2.5	
10	Dorado	2.0	
11	Dorado	2.0	
12	Tanque Bayamón	10	
13	Tanque Bayamón	10	